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**APPLICATION OF EXCLUDABLE DELAY
AND
REQUEST FOR ADJOURNMENT ON CONSENT**

January 2, 2025

The Honorable LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Ammar Awawdeh
Docket No. 24-cr-00488-LDH-1
Requested Adjournment Date: February 27, 2025

Dear Judge DeArcy Hall:

Hope this correspondence finds you well. Please be advised that I, Matin Emouna, of the firm Emouna & Mikhail PC, along with Mark Lesko of the firm Greenberg Traurig LLP, represent Ammar Awawdeh, the defendant in the aforementioned matter.

By way of background on December 12, 2024, Mr. Awawdeh was arraigned before Magistrate Judge Marcia M. Henry and pursuant to the Order of the Court this matter was scheduled for a Status Conference on January 8, 2025. (*See* Dkt. No. 65).

Based on my correspondence with AUSA David Berman it is respectfully requested that this matter be adjourned for fifty (50) days to Thursday, February 27, 2025 or else another date convenient to the Court.

The parties respectfully seek the foregoing exclusion of time as they are engaged in plea negotiations, which they believe are likely to result in a disposition of this Case without trial, and they require an exclusion of time in order to focus efforts on plea negotiations without the risk that they would not, despite their diligence, have reasonable time for effective preparation for trial.

As Counsel to defendant, Ammar Awawdeh, I certify that I have reviewed this application with my client. I further certify that I have discussed with my client a defendant's right to speedy trial and the question of whether to consent to entry of an order of excludable delay. I am satisfied that my client understands the contents of this application, that my client consents to the entry of the order voluntarily and of his own free will, and that my client has not been threatened or coerced for consent.

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Accordingly, defendant Ammar Awawdeh hereby respectfully requests that the time period from January 8, 2025 until February 27, 2025 or else another date convenient to the Court be excluded.

The Court's time and attention to this matter are greatly appreciated.

Respectfully submitted,

/s/ *Martin Emouna*

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